Nutrition Labelling Policy Review: Stakeholder Perspectives

Results of Analysis of Stakeholder Responses to Health Canada's Nutrition Labelling Policy Review — Consultation Kit

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Executive Summary

Health Canada has undertaken a major review of nutrition labelling policy, with the goals of improving the usefulness of nutrition labelling, increasing its availability and broadening public education on its use.

Nutrition Labelling Policy Review — Stakeholder Perspectives presents the results of one element of the policy development phase — consultation with stakeholders across Canada who were invited to review proposed elements of the nutrition information panel on food labels. The report presents the results of a qualitative analysis of responses from 183 stakeholders, including individuals and organizations from the industry, health, education, non-government and government sectors, as well as consumer groups, the media and members of the public.

The results, organized by five broad themes (content, format, availability, education, and cross-cutting and emerging issues) and the 15 specific questions posed to stakeholders, demonstrate that there is widespread support for many of the proposals being considered by Health Canada. At the same time, some sectors clearly do not support specific elements under consideration. A closer examination of the responses by theme provides a picture of stakeholder support and concerns.

Content issues...

In all but the industry sector, there is strong support for the nutrients proposed as a core list on the nutrition information panel. Supporters of the proposed list in all sectors suggest additions — with folic acid, fat, potassium, sugar, vitamins A and C, and cholesterol the most frequently requested. Trans fat was the main nutrient suggested for deletion from the proposed list.

Within the industry sector, where there is generally low support for the proposed list, the majority of the pre-packaged food sub-sector does not support it. Other sub-sectors are divided on the issue, with the majority of producer associations indicating support.

Format issues...

Respondents from across all sectors are virtually unanimous in supporting the need for a consistent "look" for the nutrition information panel. There is less consensus on what constitutes consistency, with some respondents suggesting that all graphic elements need to be the same on all nutrition information panels, while others recommend that only some key elements need to be the same to help consumers use them effectively.

Many respondents in the industry sector emphasize that flexibility in presentation is essential. This sector, as well as those in the "public" sector, do not support prescription of graphic elements to the same extent that their counterparts in the "health/education/media" sector do. There was strong agreement across all sectors that ensuring legibility and addressing the needs of those with low literacy skills are the prime considerations to be addressed in deciding which graphic elements should be prescribed.

Respondents opinions were divided on questions pertaining to panel title, declaring number of servings per package, bilingual format and order of presenting nutrients.

Many respondents support the declaration of nutrients using both absolute and relative values. A range of challenges are identified in ensuring that consumers understand the declaration — whether relative, absolute or both values are included on the nutrition information panel.

Availability issues...

There is overwhelming support across the "health/education/media" and "public" sectors for a mandatory system of labelling supported by appropriate exemptions. The majority of the "industry" sector favours a voluntary system — with the sub-sectors of pre-packaged food associations, and retail and food service associations indicating the strongest support for the voluntary approach. Individual manufacturers and producer associations are split in their support, with some favouring (or stating no opposition to) a mandatory system. Exemptions in a mandatory system are suggested by respondents in all sectors, with the most frequently cited products being fresh produce, fresh meats, fish and poultry (not pre-wrapped), those with little or no nutritional value and a variety of ready-to-eat (not pre-packaged) foods. Exemptions for small businesses are also seen as necessary to many respondents.

Education issues...

Many respondents agree that the key and fundamental element of a successful program would be mandatory and consistent, easy-to-read nutrition information panels. There is a strong pattern of agreement on the major elements of a public education program, with emphasis on: accounting for the varied needs of consumers for information; providing information in a way that suits different learning styles; providing leadership (with Health Canada at the helm); and delivery through a broad base of organizations to ensure that information and messages are received by consumers many times, in many ways, through many channels.

Other issues...

Respondents raised several issues that, while not addressed directly in the Consultation Kit, provide useful information for consideration in the policy review process. There is interest in the US model of nutrition labelling, with some respondents suggesting that this model be considered carefully as harmonization with the US approach would reduce trade barriers. Similarly, respondents cautioned that the new policy should be implemented over a reasonable time period to allow all stakeholders the time needed to adjust current labelling practices. Finally, a number of respondents raised the issues of monitoring, compliance and enforcement of a new nutrition labelling policy, calling for resources to be devoted to the complex issues that arise from implementing a new policy with far-reaching implications for both the food industry and consumers.

I Introduction

Health Canada has undertaken a major review of nutrition labelling policy. The goals of the review are to improve the usefulness of nutrition labelling, increase its availability and broaden public education on its use. Consultation with stakeholders is a key step in the policy review process.

Consultation with stakeholders was undertaken by Health Canada between May and August of 1999, and was based on a Consultation Kit developed specifically for that purpose. The consultation process was designed to obtain feedback on specific issues and, more generally, to build understanding about nutrition labelling among stakeholders.

About this report

This report, *Nutrition Labelling Policy Review — Stakeholder Perspectives* presents the results of one element of the policy development phase — consultation with stakeholders across the country who were invited to review proposed elements and aspects of the nutrition information panel on food labels. Stakeholders were invited to respond to a set of 15 questions about specific issues under consideration in the labelling review.

More specifically, the report reflects a qualitative analysis of responses from 183 stakeholders including individuals and organizations from the industry, health, education, non-government and government sectors as well as consumer groups, the media and members of the public.

Stakeholder Perspectives is organized into three core chapters, as well as supporting appendices. The report consists of two key sections:

- **Methodology** — providing an overview of the types of respondents and methodology followed to analyze responses and develop this report, including the guiding principles upon which the analysis is based (Section II).

- **Analysis of Responses by Theme and Question** — portraying feedback along the four main lines of questions in the consultation kit (content, format, availability and education), and including responses to each individual question within those themes. Emerging and cross-cutting themes are also addressed (Section III).

The report is supported by two appendices — the first providing a list of respondents by sector, and the second providing a list of the consultation questions by theme.

In presenting the results on analysis, every attempt has been made to ensure that the intended message of respondents is maintained. At the same time, in the interests of consolidating the large volume of information submitted by respondents, careful synthesis and grouping of similar responses was also conducted. Unique ideas and perspectives are presented alongside with areas of more widespread consensus or disagreement.

All responses have been kept anonymous. While individual respondents may recognize themselves in quotes, names of groups and individuals have not been used in any summary or quoted information.

The report was prepared by Allium Consulting Group Inc. of Ottawa.

II Methodology

This section sets out briefly the approach and research methodology followed in analyzing respondent feedback.

Allium Consulting Group Inc. was hired by Health Canada to conduct a qualitative analysis of responses to the Nutrition Labelling Policy Review Consultation Kit. The Kit, which included 15 theme-related questions, primarily open-ended in nature, was disseminated to key national, regional and local stakeholder groups and individuals, including government, industry, non-government and consumer organizations. The full Consultation Kit was posted on the Health Canada Web site. As well, it was designed to be easily reproducible – organizations and associations were encouraged to make the Kit available to their members.

The analysis of results consisted of a number of stages, all aimed at ensuring objective, accurate and timely reporting.

1. Developing an Analytical Framework and Guidelines for Analysis

This preliminary step was intended to set up the approach to analysis of responses in a short time, ensuring that the integrity of the responses was maintained and captured in a report. The approach and principles/ guidelines for analysis were reviewed by the Nutrition Labelling Advisory Committee prior to analysis beginning. A qualitative methodology was selected for the analysis, and was supported by a simple database software developed by Health Canada to facilitate the grouping and review of data by both question and sector.

2. Synthesizing Responses and Entering Responses into the Database

Health Canada coded all responses into one of four "sectors" following the four areas identified in the Consultation Kit respondent profile and feedback forms: "health/education/media", "industry", "public" and "other". The consulting group analysts reviewed each response, summarized responses to each question, and entered them into the prepared database. Information which was not related to nutrition labelling was not captured in the database.

A total of 183 stakeholder responses was received, representing four sector groupings:

- 93 responses from "health/education/media"
- 49 responses from "industry"
- 36 responses from "public"
- 5 responses from "other".

Each of these groupings include the following types of organizations and individuals:

- "Health/Education/Media" includes academia, provincial governments, agencies, hospital staff, community/regional health unit staff, public health associations, aboriginal councils, literacy groups, and disease-related advocacy associations.

- "Industry" includes associations and councils, marketing boards, and individual producers, manufacturers and retailers — both multi-national and Canadian organizations of various sizes (including large, medium and small organizations).

- "Public" includes public interest advocacy groups and individual members of public.

- "Other" includes associations and individuals not captured in other groupings.

A list of respondents is included in Appendix A.

3. Analysis of Data and Preparation of the Report

Once the responses were entered into the database they were analyzed and synthesized into a report using the principles/guidelines for analysis of stakeholder responses developed earlier. All questions in the Consultation Kit were addressed. Respondent anonymity was maintained in the report, although unattributed quotes were used throughout. Responses were not weighted and unique responses were provided as well as trends where they were evident. Providing responses made by only one or a handful of respondents was viewed as an important mechanism for pursuing innovative solutions.

Principles/Guidelines for Analysis

The following principles or guidelines formed the basis of review and analysis of stakeholder responses.

1. The ***purpose of the analysis is to organize, group and synthesize respondent feedback in a way that will provide an effective tool for decision-making*** (establishing policy) ***and for program development*** (education for consumers and other stakeholders).

2. ***Analysis will be based on a critical mass of responses received by early August*** — stragglers will be accepted and rolled in to the results only when the analysis will not be taken off track in terms of timing. This will ensure a useful, coherent report.

3. ***Each response is considered as an important unit for analysis, and responses will not be weighted.*** This will ensure that every response is treated equally, and that insightful observations and good ideas will be captured whether offered by ten respondents, or by only one.

4. ***Responses will be analyzed into a number of core, pre-determined themes, while ensuring that any emerging themes are addressed.*** This approach will ensure that information needed to contribute to policy decisions and program decisions is presented, while other potentially useful information can also be considered.

5. ***Responses — primarily qualitative in nature — will be synthesized and grouped as succinctly as possible, while ensuring that important nuances of each response are captured.*** This approach will help to ensure that the responses are synthesized in a way that supports decision-making along the pre-determined and emerging themes.

6. ***Confidentiality of respondents will be maintained.*** Respondents will not be identified by name in the final report — but will be organized by sector and, where possible and potentially useful to contribute clarity, by sub-sector. It is anticipated that clustering of responses by subsector will be most useful when there are strongly divergent views on an issue so that the views can be considered with greater insight.

Presentation of Findings

The stakeholder responses are presented on a question-by-question basis, using the broad themes of the Consultation Kit. More specifically, the data are organized into five broad areas:

- **Content** – focusing on the proposed core list of nutrients and education issues that may arise from that list (two questions)
- **Format** – featuring a range of topics including importance of consistency of look, methods of presenting nutrient information, order of nutrient presentation, title, usefulness of servings per package information and bilingual formats (seven questions)
- **Availability** – dealing with the issue of mandatory versus voluntary nutrition labelling (three questions)
- **Education** – in addition to the specific education issues related to the core list of nutrients and the format, presenting ideas and recommendations for ensuring consumer awareness and knowledge of nutrition labelling (three questions)
- **Cross-Cutting and Emerging Issues** – addressing some additional issues that were not addressed explicitly by questions in the Consultation Kit.

III Analysis of Responses by Theme and Question

This section of Stakeholder Perspectives presents the results of analysis on a question-by-question basis, and follows the same basic thematic organization of the questionnaire as that presented to stakeholders in the Consultation Kit (see Methodology).

A. Content

This section reviews the responses to the questions about the proposed core list of nutrients for the nutrition information panel. The questions are:

- Do you agree with the nutrients being proposed for the core list?
- Can you share any educational insights regarding the nutrients on the new core list?

In broad terms, support for the nutrients proposed for the core list is mixed, with most respondents in favour of the nutrients. Some endorse the proposed core list exactly as presented in the Consultation Kit, and most respondents support the list with suggested additions and/or deletions. A relatively small number of the total respondents do not support the list, even with additions and/or deletions, with alternatives suggested by some.

On a sector basis, there is a definite pattern of support and opposition. Results show clearly that respondents in the three sectors of "health/education/media", "public" and "other" are overwhelmingly supportive of the proposed nutrients, with a range of additions and/or deletions suggested in all three sectors.

Within the "industry" sector, opinion on the core list is split. A majority of the major associations representing the pre-packaged food industry is opposed to the proposed core list, while the associations representing producers say they support it. Within the manufacturer sub-sector, opinion is also divided, with some supporting the list and others opposing it.

Suggestions for education-related challenges and ideas for educating consumers about elements of the core list were made by respondents in all sectors. Some of the proposed modifications (additions or deletions) to the core list were presented as a way to improve consumer understanding and facilitate more widespread use of the panel by consumers.

More detail about the responses, including specific suggestions for modifying the list (in the case of those who support the proposed nutrients), and alternatives to the list (from non-supporters), are presented below, under the broad headings of:

1. Support for the proposed core nutrients
2. Little or no support for the proposed core nutrients
3. Issues raised by both "supporters" and "non-supporters" of the proposed core nutrients
4. Educational Insights Relating to the Core List

1. Support for the proposed core nutrients

There is overwhelming support from respondents in the "health/education/media", "public" and "other" sectors for the proposed list of core nutrients. Some segments of the industry sector also support the core list – these include producer associations and some individual manufacturers. Among those respondents who support the proposed core list with no or few modifications, most attributed their support to one or more of several key reasons:

- the list represents a significant improvement over the current list
- the list is not too long to be overwhelming for the consumer
- it is in keeping with current public health priorities.

One suggestion was that while the list was appropriate for now, it should be reviewed periodically (i.e., every five years) to reflect current scientific information and priorities.

Suggested modifications (additions/deletions) to the proposed core list

As a group, those whose responses indicate support for the nutrients on the proposed core list suggested a wide range of modifications to enhance and improve the list:

Additions to the core list suggested by respondents include:

- **folic acid** – suggested by respondents in virtually all sectors, on the reasoning that it has an established role in the prevention of neural tube defects and in heart disease prevention

- **fat** – a complete list of fatty acids including polyunsaturates and monounsaturates – so consumers have a full picture and can make better sense of the information, including being able to identify sources of desirable fat and understand the fat values. Several respondents suggested that fats should also include essential fatty acids – omega-3 and omega-6 fatty acids, since research indicates their significant health benefits

- **potassium** – because it is critical for those with renal disease and important for those with hypertension as well as those on certain medications. A few respondents say they only support the inclusion of sodium if potassium is also presented on the core list

- **sugar** – raised by respondents in the "health/education/media" and "industry" sectors – either by itself and/or with other carbohydrates, to aid consumers with prevention of dental caries and management of diabetes, and because consumers continue to request information on sugar

- **vitamins A and C** – to help consumers determine the nutritional value of processed foods that contain fruits and vegetables

- **cholesterol** – because of the documented health risks associated with dietary cholesterol, as well as the fact that consumers also continue to request information on cholesterol.

- **other elements** – including artificial sweeteners, fat replacers (including modified starches, sucrose, polyesters, etc.), "herbally significant" components, phenylalanine, electrolytes, water and oxygen.

Other suggestions for additions to the panel offered by a small number of respondents include declaration of genetically modified organisms (GMOs), growth hormones, MSG, alcohol and other additives, and stating whether antibiotics, pesticides and herbicides were used in production. It was also suggested that labels should specify if the food has been irradiated, and in which country the food was produced.

Deletions to the core list suggested by respondents include:

- **trans fat** – a suggestion made by several respondents in all sectors, primarily because of the low level of consumer understanding of trans fat (one respondent cited the National Institute of Nutrition (NIN) 1999 report of nutrition labelling consumer research, quoting that only 17% of Canadians understand the concept). Another reason provided is the need to keep the list and its messages simple and easy to understand. One suggestion was to move it to the "permitted" list, in the interests of potential future US mandatory inclusion and reduction of barriers to trade for Canada

- **other nutrients** – fibre and protein were suggested for removal from the core list by one respondent each.

2. Little or no support for proposed core nutrients

Significant disagreement with the proposed core list was expressed by some sub-sectors of the industry sector – more specifically, by the major associations representing the pre-packaged food industry, as well as some individual manufacturers. Their lack of support for the nutrients appears to centre on four reasons – that the proposed core list is:

- a "wish list" compiled by nutrition and diet-related disease experts, with little understanding of the consumer's understanding of nutrition

- not supported by scientific recommendations (e.g., no scientifically agreed upon reference values for consumption of trans fatty acids, sodium, fibre)

- inconsistent with national nutrition guidelines

- irrelevant to consumer needs – a respondent quoted the 1999 NIN nutrition labelling consumer research finding that "30% of Canadians rarely or never use the current nutrition information panel".

One respondent who does not support the nutrients suggested that the American experience should be considered – more specifically, the fact that mandatory labelling in the US has not improved consumer understanding/reduced confusion. A few "industry" respondents argued for not having either saturated or trans fat on the list because industry needs the flexibility to purchase and use a variety of fat types in order to keep Canadian industry competitive in the North American market.

Alternatives to the proposed core list

Alternative approaches were offered primarily by respondents in the pre-packaged food sector – the majority of which do not support the proposed nutrient list:

- **retaining the current core list** – already familiar to Canadians, and reasonably successful. (A position based in part on some of the findings of the 1999 NIN nutrition labelling consumer research that 83% of Canadians claim some understanding of the nutrition information panel (NIP), with 43% believing that their understanding is very good, and 47% saying that nothing needed to be done to improve the NIP).

- **using the US core list approach** – with those in the industry sector who support this option seeing it as an opportunity to eliminate a trade barrier.

3. Issues raised by both "supporters" and "non-supporters" of the proposed core nutrients

Regardless of whether or not they support the nutrients proposed for the core list, respondents identified a number of concerns, clustered here under four issue areas:

- **the profile of fat** – the overall presentation of fats was a concern that surfaced in several responses. One perspective was that the proposed listing of fat was leaning toward the "American fat-phobic perspective" on nutrition. Another concern was that the absence of monounsaturated and polyunsaturated fats and the addition of trans fat would not be understood by consumers. One respondent pointed out that trans fat is not recognized in the US as a "defined nutrient, nor is there an approved method for testing".

- **fibre issues** – many respondents applauded the inclusion of fibre on the core list, while a few pointed out that, without approved levels of fibre intake, its place on the core list is questionable. Others suggested distinguishing between soluble and insoluble fibre.

- **micronutrients** – most of the concerns relating to the micronutrients focus on the fact that individual needs vary widely (i.e., by age, gender, whether pregnant or lactating), and that information on micronutrients could be misleading (i.e., bio-availability of such

nutrients as calcium and iron is key in assessing the usefulness of consuming particular amounts of micronutrients). While inclusion of sodium as a stand-alone item was seen by a few respondents as inappropriate, many more support including sodium, as a way of reducing a significant threat to health for some people.

- **calories vs. energy** – most comments on the use of the word "calories" as a replacement for the term "energy" in the core list were positive. In particular, respondents in the "health/education/media" sector noted their preference. Some said they would like to see kilojoules as well as or instead of Calories as the unit of measure of energy.

4. Educational Insights Relating to the Core List

In response to the question "can you share any educational insights regarding the nutrients on the new core list?" respondents across all sectors identified a number of ideas, presented below under two main themes: linking the core list to healthy eating guidelines; and addressing areas of potential consumer confusion.

Linking the core list to healthy eating objectives and guidelines

Respondents suggested that education initiatives be aimed at:

- demonstrating a clear link to *Canada's Food Guide to Healthy Eating*
- emphasizing the Canadian approach to nutrition of "health promotion", and not the American model of "disease prevention"
- keeping the education approach simple – one respondent pointed out that "even highly educated people have difficulty with the current labels"
- promoting the value of the "total food picture", including variety, balance and moderation, and avoiding the "micro managing" of diets with undue focus on nutrients, and the "labelling" of foods as either "good" or "bad"

- addressing children through education initiatives to encourage good eating habits early in life. It was suggested that this should be done by building nutrition information into curriculum (for example, in math, science and home economics).

A more general comment about education was the perceived difficulty in educating consumers about the role and importance of nutrients – according to one respondent, a problem exacerbated if there is no scientific rationale or guidelines for intake (e.g., trans fat, fibre and sodium).

 # Reducing potential consumer confusion

Again, a number of recommended actions were mentioned, including:

- providing the rationale for including nutrients, as well as the list of nutrients themselves. One respondent suggested publishing a summary of current scientific knowledge about the health effects of nutrients on the core list

- clarifying issues concerning fat content – explaining the significance of trans fat, optimal "fat" intake, "good" and "bad" fat, and providing an easy to understand rationale for the absence of monounsaturated and polyunsaturated fats

- explaining the absence of cholesterol from the core list

- informing consumers about the varying needs of individuals for micronutrients (e.g., absorption of calcium and iron) and explaining such differences as that between sodium and salt (which, according to one respondent, many consumers use interchangeably)

- making clear the difference between folic acid and folate

- promoting the benefits of fibre, and the differences between soluble and insoluble fibre

- informing consumers about how the "% Reference Daily Intake" is derived

- ensuring that manufacturers cannot attach health claims about selected nutrients.

In addition, some **broader observations about consumer education** point out potential areas that must be considered if education is to be successful:

- the length of the core list (i.e., longer than the current list) may mean that educating consumers is difficult and/or impractical – this should be carefully reviewed before the core list is finalized

- the absence of a nutrient on the core list may create the (false) impression that the nutrient is not present in the food

- clarity, where appropriate, about whether the nutritional values are based on the raw or cooked foods, and about whether the nutrients listed are naturally occurring or artificially enhanced.

Many respondents from virtually all sectors stated that messages to consumers – about the core list, as well as other nutrition messages – must be both simple and consistent.

B. Format

Seven questions regarding format were included in the stakeholder Consultation Kit, all aimed at understanding what, if any, presentation and graphic issues are important to the various stakeholders. Each of the questions, set out below, is addressed in this section of the report.

- How important is consistency of look? Explain.
- To what degree should any graphic elements be prescribed?
- Which panel title is better for consumers? Why?
- Is providing the number of servings per package useful? Why?
- Does it matter which order of presenting nutrients is selected? Why?
- What are the educational challenges and solutions for the way nutrients are declared?
- Which of the two bilingual formats do you prefer? Why?

Looking at responses across this broad theme, it is clear that there are a number of areas of consensus, as well some specific points of disagreement. While respondents across all sectors are quite unanimous about the need for consistency of look, to some (especially in the "industry" and "public" sectors) this means still having at least some degree of flexibility in presentation.

Several of the format questions drew very mixed opinions – particularly those relating to panel title and bilingual formats. A wide range of solutions was identified for the long list of educational challenges associated with declaration of nutrients – challenges which touched on consumer skills and nutrition requirements, as well as on the presentation of particular nutrients.

1. Importance of consistency of look

Almost all respondents stated that consistency of look is an important element of the panel, with many suggesting that a consistent presentation is extremely important. The most commonly offered reasons for requiring consistency in a nutrition information panel are that consistency:

- fosters comfort and familiarity, making it a practical tool – easier to find, to understand and to use in assessing and comparing products

- is fundamental to minimizing mis-interpretation and confusion, and is therefore essential for the harried and hurried shopper

- provides the repetition necessary for learning how to recognize and use a nutrition label, and is key for a successful public education program

- eliminates the variety in labels that could lead to frustration, error and more work on the consumer's part – with the possible net result of the consumer simply not using the nutrition information panel

- promotes the credibility and reliability of the information on the label – suggesting that it is "not merely a marketing tool". In other words, it supports consumer confidence – the key to maximizing its use

- ensures a level playing field – by preventing any one industry from using a panel to a marketing advantage

- useful for those who cannot read English or French as they can be directed to the location of the numbers they require.

While all respondents are of the opinion that consistency of look is very important, there is less agreement about what is necessary to achieve consistency. Some reported that all elements need to be consistent (i.e, graphics, format) while others took a more moderate position, suggesting that only some key elements must be the same on all labels. Most of the elements where flexibility in presentation was seen as acceptable or ideal centred on the graphic elements of the label (addressed in 2, below).

It is worth noting that a few respondents took the position that consistency could be achieved by the *presence and accuracy* of information, and by consistent *ordering* of information, rather than by presentation details, such as those concerning the graphic format. More specifically, many in the industry sector emphasized the need for "flexibility" in relation to format issues to "encourage" the availability of information (suggesting their preference for continuing the voluntary system, discussed in Section C: Availability).

2. Prescription of Graphic Elements

A range of opinion was expressed about the extent to which graphics should be prescribed. Most of the respondents in the "health/education/media" sector recommend that all or most graphic elements be prescribed, with far fewer of their counterparts in the other sectors recommending such a degree of prescription. Of those who support prescription of most/all graphic elements, several identified legibility issues – particularly for the elderly, those with some visual impairment, as well as those with low literacy skills.

Many "industry" respondents called for some degree of flexibility to allow them to accommodate various package shapes and sizes (especially the smaller sizes), to continue use of existing print colours and designs (costly to revise), and as a means for distinguishing their product from that of other producers. Other industry concerns are that rigid label requirements (in addition to the extra space requirements for bilingual text) will involve greater printing costs (if additional colours are required). One suggestion offered was to leave design decisions to the manufacturer.

Some "industry" respondents asked for a set of guidelines that would provide some consistent elements to create a "similar impression" — *providing parameters* concerning font size, contrast of background with lettering colours, etc. — but *not dictating* the precise font size and style, panel shape and colours. Others argued for the US approach of a choice between four panel designs. A few respondents suggested that Agriculture Canada's 1996 consultation document *Regulatory Review of Food Labelling* be used in addressing these issues.

Within the broader trends described above, respondents from every sector expressed the opinion that only some of the graphic elements need to be prescribed, with those frequently suggested including font size (minimum size to ensure legibility), high contrast between colour of lettering and background, use of upper and lower case print, and panel shape. One respondent suggested that consistency of font should be prescribed and that selective highlighting of information should not be permitted unless specifically provided for e.g. use of bolding to highlight headings.

3. Preferred Panel Title

There is significant support for both panel titles proposed — "Nutrition Information" and "Nutrition Facts". A number of respondents suggested that title selection should be resolved through consumer research and testing. The reasons given for supporting both options are set out below:

 # Support for "Nutrition Information"

- best describes what is being offered – since there is naturally occurring variation in the nutrient content of all foods (depending on season, location, etc.)
- creates a user-friendly image ("facts" being too dictatorial, implying that information is "cast in stone")
- is familiar to Canadians
- is (according to respondents in the "health/education/media" and "industry" sectors) preferred by consumers.

 # Support for "Nutrition Facts"

- same as title used in the US – making it better for Canadian food exporters
- is more "readable"
- is shorter, takes less space
- is simpler, easier to grasp
- "facts" was more appropriate because "this is what RDs teach, no ifs, ands or buts".

Some respondents – including those in the "health/education/media" and "industry" sectors – do not like either title. One argued that "Nutrition Information" is grammatically incorrect as well as being inaccurate: "Nutrient Information" was proposed as a more sensible alternative. Simply "Nutrition" was also suggested as an appropriate title. Few comments on the French-language version of the title were received. Among those who did comment, some indicated preference for "valeur nutritive", and others did not indicate a preference.

4. Number of Servings per Package

As with most of the presentation issues, respondent opinion is divided on the usefulness of providing the number of servings per package. Those who support including this information say they do so for one or more of the following reasons:

- many consumers have no idea what an appropriate portion should be
- it makes product comparisons easier
- it helps people visualize amounts without a calculator
- it helps determine how much to buy and answer the question: "will this feed my family until the next time that I go to the store?"
- it may help reduce over eating.

Those who did not support the inclusion of this information presented one or more of the following reasons:

- 1999 NIN nutrition labelling consumer research indicates that serving size information does not improve consumer understanding – 42% of consumers rarely or never use serving size information
- it doesn't relate to the nutritional values
- it is not sensible for some foods (e.g., large box of cereal, bag of flour, bag of potatoes, etc.)
- it does not add value if the serving size is easy to use.

Many respondents offered additional comments about "serving sizes" with many suggesting that consumers have difficulty translating millilitres or grams to physical serving sizes. Some respondents called for presenting serving sizes that:

- are "realistic" – i.e, those that reflected amounts typically consumed (e.g., 2 cookies, 1 slice, etc.)
- reflect household measures commonly used (e.g., ½ cup, 2 tsp., etc.)
- are the same as those used in *Canada's Food Guide to Healthy Eating.*

Respondents also offered suggestions about measures relating to packages, offering that a measure of ½ a can or ½ a bottle or ½ a package is more meaningful for some products.

5. Order of Presenting Nutrients

There is no consensus as to the best order of presenting nutrients. A number of respondents took the position that a particular order is not crucial as long as the order is consistent — consistency in order being important to assist consumers in scanning information when assessing and/or comparing products.

Suggested guidelines for ordering nutrients

Nevertheless, many respondents recommended an approach to establishing order. These included listing nutrients by:

- order of most "important"/ "significant" nutrients first ("important"/ "significant" sometimes defined as public health significance, but was often not defined) alphabetical listing of nutrients

- macronutrients first, followed by micronutrients
- the current order – because it is familiar to Canadian consumers
- the order used in the US – harmonization is important for trade
- relative quantity of each nutrient.

 # Suggested order for nutrients

In addition, a number of respondents offered suggestions for specific ordering of nutrients, including:

- carbohydrates, fat, protein
- protein, fat, carbohydrates
- protein, carbohydrates, fat (so that consumers will not focus too much on fat)
- calories first – since "everyone wants to know this"
- sodium at the bottom with the other micro-nutrients.

6. Educational challenges and solutions relating to declaration of nutrients

While stakeholders were not asked which type (absolute or relative) of declaration of nutrients they prefer, many offered an opinion. These views, in general terms, are presented below, as they provide important context for respondents' views on educational challenges, and may prove to be useful in future decision-making:

Respondent preference for method of declaring nutrients

- many respondents prefer including ***both absolute values and relative values,*** since both provide consumers with important information

- some respondents prefer ***absolute values*** because: the consumer needs to know what the recommended amounts are; these values are useful when teaching about any nutrient that is the focus of a special diet; and because diabetics and others on special diets require absolute values to plan their meals

- some respondents prefer ***relative values*** because they are useful to individuals with minimum nutritional knowledge. It was pointed out that they may be misleading, as the information does not apply to all individuals since the values are based on a healthy, average, adult individual, and not athletes, pregnant/lactating women, or individuals with health conditions.

Education challenges associated with methods of declaration

A variety of educational challenges relating to methods of presenting nutrient information were identified by respondents across all sectors. It was suggested that both methods have strengths and weaknesses. Furthermore, any form of declaration must be supported by education to consumers, given the varied skills of consumers to evaluate label information and relate it to their nutrition decisions as well as the high level of illiteracy among some segments of the population.

It was pointed out that there is the potential for confusion about whether the declaration is for products "as purchased" versus "as consumed" (e.g., eggs added to the cake mix; milk added to the cereal; raw versus cooked). Another general concern about how nutrients are presented is the potential uncertainty about whether the stated amount of the nutrient, in the panel, reflects the actual content of the nutrient in the food or an average amount.

Challenges specific to the proposed methods of declaration were also identified by respondents:

 # Educational challenges related to the *relative values*

- relative values are different from what Canadians are already familiar with and therefore likely to be confusing
- people with insufficient nutrition knowledge may misinterpret label information and not understand what the percentages mean, leading to potential confusion about why percentages do not add up to 100%
- the overall need to establish some Recommended Daily Intake values suitable for all age groups and genders
- need to include modifications for infants and young children (e.g., put "fat" intake issues into appropriate perspective).

Educational challenges related to *absolute values*

- many consumers do not know how much of a particular nutrient they need – provision of the absolute values does not help people to link individual foods to the total diet approach

- overall, a greater educational effort will be required to ensure that consumers make good use of the absolute values.

Educational challenges related to providing *both methods of declaration*

- a number of respondents suggested that if both absolute and relative values are used, there is a possibility of creating "information overload" for consumers, as well as confusion.

Educational challenges related to specific nutrients

- **calcium, sodium, iron** – need for, and difficulty in providing nationally approved messages when needs for these vary widely with gender and age

- **fat and sugar** – potential for confusion and misinterpretation if values are presented as a percentage especially if some fat values are interpreted as a percentage of a percentage. In addition, at least one respondent from every sector argues for including the percentage of total calories from fat and from sugar (primarily because that is what consumers want).

Suggested education-based solutions to challenges of method of declaration

Suggestions to address some of the issues and challenges listed above include:

- providing clear definitions of absolute and relative values

- using user-friendly educational tools (to take into account low literacy and poor vision)

- providing simple, clear messages about significance of nutrient to diet

- making the label simple enough to stand on its own, without requiring education programs to teach consumers to "read between the lines"

- developing math modules for schools to help students learn the math necessary to work with the information on nutrition information panels

- colour coding reference links to *Canada's Food Guide to Healthy Eating*, possibly optional code for professionals and their patients to assist those whose cultures are more picture-based (e.g., Canada's natives)

- introducing UPC bar codes with additional details for those who needed this information (a bar code scanner could be located in the store for use by consumers)

- using Health Canada logo to add credibility.

While one respondent suggested allowing food companies to provide nutrition education on packages close to the nutrition information panel, another called for Health Canada to ensure that manufacturers cannot make "health claims" for selected nutrients.

A number of respondents reinforced the recommendations that consumer research be undertaken to ensure that consumer needs are understood – education programs should be developed on the basis of this research.

 # Rounding rules

The rounding rules are also an area of interest and concern for some respondents. There is support for using the US rounding rules because these might assist consumer understanding – particularly where a product advertised a "free" claim (e.g., "fat free"). This was seen as a better approach by one respondent than the declaration "insignificant amounts".

One respondent recommended rounding less than 0.5 grams to zero (not to the nearest tenth), with declaration of zeros, even if a "free" claim was made. Alternatively, it was suggested that a note could be used to indicate a negligible amount of the nutrient, using such terms as "trace". It was also pointed out that consumers would need to be educated about the fact that a declaration of zero may mean that an insignificant amount is present.

7. Bilingual Formats

Respondents' answers and comments on the proposed bilingual formats covered the spectrum. While there is support for both examples, there is also a group of respondents who do not appear to support either label. Still others recommended that this topic be the subject of consumer research and testing. A few (from the "industry" sector) said this decision should be left to the manufacturer (designer of the label) and a few others called for separate panels altogether.

Support for bilingual label "Example A"

Reasons for support included that this format is:

- better for those with limited language skills or limited skills in the second language
- neat and uncluttered
- better for the visually impaired
- easier to read; less text "to get through".

Support for bilingual label "Example B"

This option's supporters liked it because the label is:

- easier to read left to right (Example A required reading right to left in French, which is difficult)
- clearer, and has a more familiar look than Example A
- similar to the US format
- narrower, takes less space than Example A
- words are similar enough, people will get used to reading both languages
- easier to make sense of – it links nutrient numeric values to the amount needed.

An argument in support of separate panels was that people with low literacy skills would try and read both languages (if the two languages are presented together in the same panel) without realizing that they were not reading their own language. Two separate panels with columns titled "English" and "French" was suggested.

C. AVAILABILITY

Respondents were asked three questions about the availability of the nutrition information panel. They were asked to comment on:

- If the Policy Review results in a *voluntary system with incentives*, can you give us suggestions for incentives?
- If the Policy Review results in a *mandatory system with exemptions*, what foods and businesses would you see being exempted?
- We currently have a voluntary nutrition labelling system. Do you want it to change to a mandatory system? Why?

In general terms, there is overwhelming support across the "health/education/media" and "public" sectors for a mandatory system of labelling supported by appropriate exemptions. The majority of the "industry" sector favours a voluntary system. Within the "industry" sector, the pre-packaged food associations, and retail and food service associations, with few exceptions, are in favour of a voluntary system. Individual manufacturers and producer associations were split in their support, some indicating support for (or no opposition to) a mandatory system and others supporting a voluntary system.

1. Desire to Change to a Mandatory System

Support for change to a mandatory system is very strong in the "public", and "health/education/media" sectors. However, some "industry" respondents also appear to welcome the prospect of a mandatory system, both to support consumer interests, and to "level the playing field."

Most supporting a mandatory system appear to do so on the assumption that appropriate exemptions would be available. One respondent offered to support the move if the system was properly structured, responsive to changes in science and knowledge, and was not controlled by government but by an industry group making recommendations to the Minister. In fact, very few respondents in any sector said they were in favour of a mandatory system with no exemptions.

About the use of a mandatory system

Respondents provided their views on a number of issues related to the use of a mandatory system, including the benefits and negative implications of the mandatory approach, as well as ways of overcoming some potential problems. These are outlined below.

Benefits of a mandatory system

The reasons behind support for a mandatory system centred primarily on consumers, who would:

- know what they are consuming (a right for Canadians), and get the nutrition information they want. One respondent summed up the views of several supporters of this notion: "ignorance is not bliss"
- have access to this vital educational tool, which could encourage some manufacturers to produce healthier foods in response to demand from better informed consumers (e.g., create foods with lower sodium content)
- have additional support in comparing foods and making healthy food choices and reduce their risk of diet-related diseases
- in the case of consumers with diet-related diseases – provide information to assist them in finding appropriate foods to meet their special requirements
- benefit from financial savings to the health care system and the economy as a whole
- have greater confidence in Canada's food supply.

Negative implications of a mandatory system

The arguments presented by respondents who are *not in favour* of a mandatory system are:

- consumer demand for information will be met voluntarily by industry – one respondent in the pre-packaged food association sector suggested that the food industry is currently supplying nutritional information for about 65% of its products and is committed to increasing this to 100% within the next two to three years

- the benefits of a mandatory system have been exaggerated, with food labelling not able to influence consumer behaviour to the extent claimed by proponents. One respondent pointed to the US experience, where "Americans are not healthier, nor better informed, and obesity is on the rise"

- the economic implications are significant: are consumers willing to pay for the cost of nutrient analysis? Do consumers understand that the nutrient values on a label are pooled estimates and that there is variation in the amounts found in foods? How many Canadian businesses will be able to sustain the costs of providing nutritional labels in the North American marketplace? One respondent estimates the cost of nutritional analyses to range from $340 to $3,200 per product. Others argued that the cost of making labels will drive food prices up and Canadian (especially the small and medium-sized) businesses out of business

- higher food prices will make it difficult for Canadians with insufficient finances (and for whom label reading may be a low priority) to afford food to meet nutritional needs

- compliance will be difficult – some industries do not have centralized packaging and when packaging is done at the point of purchase there is limited labelling capabilities.

Overcoming the challenges of a mandatory system

In the event of mandatory labelling, some ideas were offered to address the challenges of implementation. These include:

- Health Canada committing to updating and improving the Canadian Nutrient File – *before* committing to mandatory labelling

- developing an inventory of laboratories in Canada that can conduct the required nutritional analysis, and fully consider their capacity to bear the additional testing, as well as the costs of testing

- development of educational tools to support industry's adjustment to a mandatory system – to be jointly developed by Industry Canada and Health Canada. Such support could take the form of providing calculators designed specifically to assist in nutrient calculations, and development/maintenance of a Web site.

About the use of a voluntary system

Respondents also commented on the use of a voluntary system – providing insight into the some potential implications of using a voluntary approach, as well as ways of supporting consumers if a voluntary system is maintained. These are presented below.

 # Implications of a voluntary system

A number of respondents offered explanations for their lack of support for a voluntary system. A voluntary, incentive-based system was seen to:

- leave room for loopholes, misleading information and privilege for the manufacturer, not the consumer
- not encourage producers to do more than they do now
- lead to misleading labelling – something which is already occurring (e.g., omitting information on fat or salt)
- be overshadowed by increased sales due to non-disclosure of important information (e.g., sugar in fruit drinks)
- go against the policy objectives of Health Canada's *Nutrition for Health - An Agenda for Action* (i.e., providing the consumer with tools)
- fail to produce a uniform and comprehensive nutrition information panel.

Others suggested that industry's ability to trade/sell food in Canada and consumer demand should be enough of an incentive for industry, and that incentives are already offered by consumers and health professionals.

Respondents also raised issues concerning the equity of a system of incentives. A number of questions were raised, including: How would this apply to beef products? If a marketing association made a claim and they didn't control labels (for example, on produce or meat), how would this be handled? Would this create an unfair marketing advantage for pre-packaged goods?

Action to support a voluntary system

In addition to incentives, some respondents offered ideas as to how a voluntary system could be supported, including the options of:

- grocery store messages indicating which products have up-to-date labelling – aimed at attracting consumer attention and thereby increase producer compliance
- nutritional analysis by associations like the Canadian Diabetic Association – providing product analysis and endorsement on package (much like dental associations do for toothpastes)
- Health Canada working with food manufacturers to determine appropriate incentives
- developing public service announcements to direct attention to nutrition information panels.

2. Suggested exemptions if a mandatory system is used

It is clear that most respondents accepted the idea that in a mandatory system, it would be appropriate to have some exemptions available. Many suggested adopting the US exemptions, claiming that they appear to cover their main areas of concern.

Not all respondents support the same exemptions. While some say they support exemptions for foods from delicatessens and from small businesses, others are only willing to accept the notion of exempting fresh produce. Overall however, the categories most frequently mentioned as deserving exemption status are:

- fresh produce (fruits and vegetables)
- fresh meats, fish, poultry from a butcher (not pre-wrapped)
- foods with no/insignificant nutritional value (e.g., coffees, teas, spices)
- bulk foods
- ready-to-eat (not pre-packaged) site/store packaged food (e.g., food from delicatessens, bakeries, take-out and restaurant establishments, bake sales, food service industry)
- products from small businesses
- very small packages.

A number of respondents raised concerns about the quality of food from delicatessens (e.g., fat content of ready-to-eat salads, "low-fat" bologna), some of whom suggested ways that foods from the above list could be labelled relatively easily and inexpensively. Ideas for providing nutritional information at the point of purchase include:

- tear-off sheets on shelf
- tear-off labels on bulk bin
- signs with nutritional information close to items displayed
- handouts/fact sheets available on demand
- notes within looseleaf notebooks.

Other thematic suggestions include:

- **small business exemptions** – There was considerable discussion across all sectors about a potential small business exemption, including how small is "small", as well as how the US criteria (e.g., number of employees, dollar volume of sales) might be modified to suit the Canadian scene. One suggestion offered to accommodate small businesses was the introduction of either a support/grant program or a sliding scale to cover the costs of laboratory analysis.

- **frequently eaten fruits and vegetables** – One suggestion was adopting the US approach of requiring information at the point of purchase – the suggestion included making this mandatory for chain stores, and voluntary for unaffiliated stores (whose sales only account for 9% of total sales), as well as for convenience stores. It was also observed that marketing boards should share this responsibility with the food stores.

- **confections, candies and chocolate bars** – Here, opinion was divided. Some said that labelling would be useful to educate people about how little food value is in these items and about the energy, fat and carbohydrate density. Others said that the lack of nutritional merit in these foods is obvious to everyone.

- **gift and other items** – Include labels only inside the package for the benefit of the recipient of the gift. Another respondent suggested that such items as multi-unit packs, gift baskets, and surprise bags might be considered for exemption if the inside packages which they contain are fully labelled, and in the case of multi-unit packages, the mandatory nutrition labelling information can be quickly viewed at the time of sale.

Other suggested exemptions included foods currently exempted from ingredient listing (B.01.008, *Food and Drugs Regulations*). One "industry" respondent suggested that a test protocol exemption "should be added for test market and introductory products, allowing nutritional labelling on testing of a smaller, non-commercial set...final testing would occur with commercial production runs".

The "no exemptions" perspective

Some respondents in each sector support the approach of a mandatory system with no exemptions. A number of respondents took the position that every food sold must be labelled or be supported by nutritional information at the point of purchase or by the supplier. For restaurants, this would require supplying nutritional information on all items of a daily menu, with daily specials being (perhaps) the only exemption (but a list of ingredients would be available on request). One respondent estimated that if all the exemptions listed in the Consultation Kit were allowed, only about half of the food consumed by Canadians would be the subject of nutritional labelling.

3. Suggested incentives, if a voluntary system is used

A number of incentives were suggested by respondents in several sectors – although most come from those in the "industry" sector who support the use of a voluntary system:

- **nutrient content claims or health-related claims could trigger the requirement for the core labelling list**. This list was expanded by some to also include: any reference to contributions to health, healthy life-styles, disease education, healthy diet, well being; any nutritional benefits, references to nutritional guidelines, suggestions that product is superior, or display of any third party symbol.

- **allowing use of "approved" data base values** – rather than analyzed values, thereby reducing costs of analysis borne by producer

- **flexibility in presentation of information** – e.g., label on bottom of package, signage, booklets, tear sheets, manuals, ads/flyers, web site, toll free lines, etc – reinforcing the point that the presence of information is more important than format or location

- **grants or rebates to cover costs of nutrient analyses and of generating nutritional information** – e.g., work of determining the serving size, monitoring production to ensure serving size does not vary, obtaining and monitoring nutrition data to determine if nutrition information could have changed, and necessity of recalculating/re-analysis and expense of re-printing the plate changes.

A number of respondents supported the suggestions in the Consultation Kit. Other individual suggestions for incentives include:

- expedite the Nutrient Contents Claims approval process
- allow new products from the US to use the American label for the first year
- make consumer/market research about advantages and benefits of labelling available to companies.

D. Education

Respondents offered many insights and suggestions concerning objectives and strategies for public education about nutrition information panels. In addition to the specific education-related questions they were asked with respect to the core list (see Section A) and the format (see Section B), they were provided with three broader education questions to address:

- What will make nutrition labelling education successful?
- What will your role be in a consumer education program?
- What would support you in helping consumers use the nutrition information panel?

Looking at the responses across all sectors, there appears to be a high level of consensus about the elements and characteristics of a successful education program, with little discernible difference in approach evident by sector. As might be expected, respondents identified their own role in terms of their overall role in the nutrition/food landscape, as well as by their occupation and area of expertise. Respondents provided a range of suggestions as to what might help them in their efforts to inform and educate consumers.

1. Elements and attributes of a successful nutrition labelling education initiative

It is apparent that the question "what will make nutrition labelling education successful" was interpreted by respondents in different ways. Some apparently took it to mean " how will we know if education is successful?" Their answers cover a spectrum of expectations, with success achieved when:

- readers read and apply the information
- consumers gain a better understanding of nutrition, take more responsibility for their own nutrition and own health and make better nutrition choices which will oblige manufacturers to provide foods with better nutritional value
- an improvement in diet and reduction in disease can be observed.

Many respondents maintained that the key and fundamental element of a successful program would be mandatory and consistent, easy-to-read nutrition information panels. Many also emphasized the importance of a commitment of human and financial resources on an on-

going, sustained basis over a long period of time. Adequate enforcement resources to ensure consumer confidence was also a key area of concern.

Most respondents focussed on describing the attributes of successful public education programs and ways in which the good nutrition practices could be best communicated. There was a strong pattern of agreement on the major ingredients required for success. In fact, one respondent summed up this pattern particularly effectively, accurately representing statements made by many respondents in all sectors. This response, shown in italics below, states that *consumer education about nutrition labelling will only be successful if:*

> ***... it accounts for consumers with different information needs and at different levels of readiness to accept information***

Many emphasized the importance of integrating nutrition labelling messages into school curriculum in a variety of ways, starting as early as possible with elementary school age children and continuing through to university age students. Others suggested reaching consumers by sponsoring or running grocery store tours and providing information (e.g., posters, printed materials, signage, UPC bar codes) at the point of purchase.

> ***... it provides information in a way that suits many learning styles, including interactive, hands-on activities***

Respondents called for program elements to be designed to be fun, engaging and "help the average busy person". Some pointed out the importance of using diverse approaches, because one cannot talk about the "average" consumer anymore. Many stressed the importance of doing sound consumer research and using tested program elements. There was an overarching call for clear, simple, relevant, practical and concise messages that would be accessible to many people.

Quite a number of respondents registered their concern that materials and approaches be developed to take into account the needs of those with low literacy levels. This concern was raised by a number of respondents in the discussion of the contents of the proposed core list by many who questioned the usefulness of including the concept of "trans fat"(which to date has been poorly understood by the public). The Health and Welfare Canada report *Action Towards Healthy Eating* (1990) was, in this context, cited for its finding that 24% of the Canadian population over age 18 is functionally illiterate.

Others pointed out the importance of taking into account the needs of the native population (whose cultures are predominantly graphic/symbols based) as well as those of new Canadians. For these people, colour codes or well-recognizable symbols were suggested as being particularly helpful.

> ***... there is leadership by Health Canada, to ensure the consistency of the program standards and messages, using the same model that has been applied to Canada's Food Guide to Healthy Eating***

Some described Health Canada's role as providing credibility and authority. Others suggested that the department should set the education priorities, such as focussing on the core list of nutrients first and reinforce the message that "all food is good". Still others expanded Health Canada's leadership role from not only developing and implementing a comprehensive communications and education initiative, but to include taking responsibility for monitoring and evaluating the success of these and related programs.

A number of respondents emphasized the importance of any initiative being national in scope, with some adding that it should feature a distinctly Canadian approach (i.e., health promotion, not disease prevention.) It was also recommended by many that nutrition labelling information should be tied to information about daily diets, and to the total diet/ healthy eating messages with clear linkages to *Canada's Food Guide to Healthy Eating.*

> ***... it is carried out by multiple organizations (health professional associations, public health organizations, national health interest groups, food industry), so that consistent messages are being received by consumers many times over, through many channels***

Many respondents stressed the importance of partnerships as a means of ensuring the messages are credible, as well as consistent. One called for a multi-stakeholder panel with adult education expertise to identify concerns, and to implement a sound and measurable strategy. Some suggested learning from the US experience, in particular contacting the American Dietetic Association for insights into what has worked and not worked in educating the public about nutrition information panels.

Many called for the involvement of various sectors: doctors; weight loss/fitness programs; food companies to develop information programs; grocery stores for tours and colourful signage; and in store "facilitators" to help consumers read labels and posters in stores.

Some nutritionists identified nutrition month as a good time to launch public education efforts. Many called for public service announcements, use of television and radio from many sources.

2. Respondents' Role in Consumer Education

The respondents who described their roles in relation to consumer education about nutrition and nutrition labelling included those who:

- **as nutritionists**, work directly with clients with chronic health issues (e.g., diabetes, heart disease) and special needs (e.g., pre-natal and new parents) in clinics, hospitals, community resource centres and related programs; or, work as counsellors of individuals; by being involved with public health education efforts, as resource persons for community groups

- **as educators**, work with teachers, students, other nutritionists, health care professionals, professional organizations and businesses

- **as consumer relations staff**, provide information and advice to consumers through correspondence, toll free (1-800) telephone number, Internet web site; develop educational materials

- **as food producers**, supply high quality food products with correct nutrition information, and participate in the design of education programs

- **as academics and research scientists**, teach and advise research studies and publish findings

- **as private citizens concerned about nutrition and food quality, as working families, as friends and community members**, boycott products without adequate nutrition information; recommend stores that do provide good information; write for media; sit on hospital boards

as professional organizations, provide "best advice", support, research; develop and disseminate information products in partnership with government, media, industry and non-governmental organizations

as government departments and agencies, develop information materials, maintain website, disseminate relevant publications to the public.

In all, few respondents did not recognize a role for themselves or their organizations as part of an effective education program.

3. What would Support Nutrition Labelling Education

Respondents also identified tools that would serve to support a successful public education effort of this kind. These involved use of print and electronic media as well as the development of more inter-active components such as games, workshops and conferences or information sessions. They identified a number of items and communication modes that would help them in educating their clients, colleagues and members of the general public, including:

Print materials:

- one page fact sheets
- tear-off sheets
- Frequently Asked Questions sheets (FAQ sheets)/Questions and Answers sheets
- pamphlets and brochures
- door to door fliers
- large posters (one requested that there be a re-usable poster)
- updated *Canadian Food Inspection Agency (CFIA) Guide to Food Labelling and Advertising*
- cartoons, graphic messages
- workbooks in schools
- pocketbook with Canadian brand names and their list of ingredients (there are American books like this)
- reference card for consumers with "recommended" daily values (including daily fibre intake), ideal guidelines (for potassium and sodium; all fats, carbohydrates, proteins, and sugars, if included)

Electronic and other media:

- short videos
- overhead slide shows
- flip charts
- web sites with information about use of the nutrition information panel as well as a "tool box" for downloading information, slide presentations, professional workshops
- transit/billboards
- interactive computer (as well as face-to-face) games
- 1-800 telephone numbers answering inquiries
- interactive activity materials for classroom teaching
- inter-active CD-ROM
- scanners providing more in-depth nutrition information
- inter-active video/computer terminals

Other support opportunities:

A number of respondents who anticipated playing an active role in educating the public asked that they be:

- kept up to date with policy and regulatory developments, dissemination plan and programs involving all stakeholders
- provided with well worded, clear regulations and guidelines and provided with documentation, materials to help understanding of the policy
- allowed to use food claims as a means for communicating nutrition science, use food and nutrition logos (such as a modified *Food Guide* to show why a food or a nutrient is important)
- given advance notice of relevant events (e.g., public education program launches)
- trained in the new label to ensure a level of confidence in teaching others including resource kit of ideas and tools for educators, guides for educators
- provided with evaluation forms to give Health Canada feedback on education program
- supported by media campaign to reach broad base of consumers

- permitted use of the Canadian Diabetic Association's symbols
- given materials with comparison/links to *Canada's Food Guide to Healthy Eating*
- provided with an updated *CFIA Guide to Food Labelling and Advertising*
- kept informed about plans for managing evolving science (how new Dietary Reference Intake values will be applied in relation to national guidelines, dietary guidance systems and nutrition labelling).

E. Cross-cutting and Emerging Issues

1. Harmonization and Trade Issues

A number of industry and non-industry respondents were interested in the US model of nutrition labelling – both as an opportunity for learning about what works and what doesn't work and, in many cases, as a model to be adopted or adapted.

A variety of reasons were provided for pursuing the US format and approach to labelling. Some see the system as being, to some extent, familiar to many Canadians. Others like the way the US system is organized – including the type of exemptions, information offered, and the degree of flexibility in format requirements. One respondent recommended that Canada ensure that our definitions were the same as those used in the US to reduce potential confusion among Canadian consumers.

Within the "industry" sector, the primary reason expressed for interest in the US system is the prospect of removing/reducing a barrier to trade within the North American marketplace. The prospect of labelling requirements which introduce *more differences* was clearly an area of concern for many industry respondents.

2. Implementation Period

"Industry" respondents provided more commentary and opinion about the implementation period than did respondents from any other sector. Suggestions for the implementation period ranged from 18-24 months for a new format, and up to 36 months to replace existing labels, to a suggestion that five years would be required.

To assist in transition, one respondent suggested that funding be provided for the disposal of packaging with out-of-date information – recognizing that some manufacturers carry inventories that would take five years to deplete.

Another related issue raised by a couple of respondents was the issue of laboratory capacity in Canada for conducting the required nutritional analysis, in the event that a mandatory system was established. The costs of such testing were also raised as a concern by more than one respondent.

3. Compliance and Enforcement Issues

A number of respondents identified the need to ensure that adequate resources are devoted to monitoring of compliance and to sustain consumer confidence in a mandatory system. It was argued by one respondent that good enforcement is critical to the effectiveness of a mandatory system. Moreover, it was strongly suggested that "tight" language and comprehensive regulations be part of the overall system to help ensure uniform implementation of the requirements, e.g. to help ensure consistent use of reasonable servings and appropriate interpretation of "single serving containers". One respondent also suggested that a "snitch line" be established so that individuals could let the authorities know when there are cases of non-compliance.

One respondent offered insights into the challenges of labelling imported products saying, that many countries, (especially the Orient), view North America as a single market and produce one product for this market. This respondent recommended that Canada adopt the US system of nutrition labelling unless there are justifiable health reasons to do otherwise. Where differences with the US system are maintained, Canada should reach agreement with the US on acceptance of products originating outside of each other's country.

This respondent also recommended that if a separate system must be maintained for health reasons, it should also be very distinct from the US system in terms of format and presentation so that both the trade and enforcement staff can readily identify the differences between the two systems. Enforcement actions on products that have only minor differences in nutrition labelling from Canadian requirements (e.g. different order of nutrients, different units of declaration, different font etc.) or variances perceived by industry to be minor (e.g. different reference intake) may be regarded as unreasonable.

One respondent suggested that Health Canada should prescribe standard methods of nutrient analysis along with a system of compliance enforcement to support consumer confidence in a new nutrition information panel.

A number of respondents (primarily from the "industry" sector) asked that industry be allowed to use database values or computer programs to determine nutrient values because the costs of analysis are a true barrier to use. Also, one respondent asked that a tolerance of 20% be allowed for products without claims, and 10% for products with claims. Another request was for more flexibility in test procedures: timing is critical in the snack industry, for example, and the option of using bench scale samples or nutrient databases for the launch of a product (followed at a later date by full testing) would be greatly appreciated.

The primary purpose of this report is to present stakeholder views on a set of five themes to assist the Nutrition Labelling Advisory Committee in their recommendations to Health Canada. Responses were set out in detail, and covered areas of agreement and disagreement with proposed options set out in the Consultation Kit, as well as a range of stakeholder suggestions. Many of the observations and opinions are "unique" to one or a handful of respondents. This is seen as potentially very useful to the Advisory Committee as it seeks innovative solutions to meet as many stakeholder needs as possible.

Appendix A
List of Respondents by Sector

Industry Respondents	
A. Lassonde Inc.	Food and Consumer Products Manufacturers of Canada
Agri-Industries Ltd.	Food Institute of Canada
Association of Canadian Biscuit Manufacturers	Great Atlantic & Pacific Company of Canada, The
Baking Association of Canada	High Liner Foods
Beef Information Centre	Hollshop Imports Ltd.
Calorie Control Council	Hostess Frito Lay
Campbell Soup Company	Institute of Shortening and Edible Oils
Can Amera Foods	Kellogg Canada Inc.
Canada Bread Company	Kraft Canada
Canada Pork	Lipton
Canadian Automatic Merchandising Association	Loblaw Brands Limited
Canadian Council of Grocery Distributors	Maple Leaf Consumer Foods
Canadian Egg Marketing Agency	Maple Leaf Poultry
Canadian Federation of Independent Grocers, The	Maple Lodge Farms Ltd.
Canadian Meat Council	Margarine Thibault Inc.
Canadian Poultry and Egg Processors Council	Nabisco
Canadian Produce Marketing Association	National Dairy Council of Canada
Canadian Restaurant and Food Services Association	Nestlé Canada Inc.
Canadian Sugar Institute	Ocean Produce International
Chicken Farmers of Canada	Parmalat Canada
Confectionery Manufacturers Association of Canada	Puresource Inc.
Culinar Canada	Schneider Corporation
Dairy Farmers of Canada	Star Egg
Dairy Farmers of Ontario	
Edible Oil Foods Association of Canada	
Farmers Co-Operative Dairy Ltd.	

Health/Education/Media Respondents	
Atlantic Superstore, Dietitian	Eastern Health and Community Services Board, Respondent
Brandon Regional Health Authority, Respondent	Foodshare Metro Toronto, Respondent
Brandon Regional Health Centre, Respondent	Guelph Centre for Functional Foods, Respondent
British Columbia Ministry of Health	Health Care/ Health & Community Services of St. John's, Dietitian
Burntwood Regional Health Authority, Respondent	Healthy Start for Mom & Me, Dietitian
Canadian Cancer Society	Heart and Stroke Foundation
Canadian Diabetes Association	HKPR Health Unit, Respondent
Canadian Living Magazine, Respondent	Hotel Dieu Hospital, Dietitian
Canadian Nurses Assocation	Interlake Diabetes Education Resource, Dietitian
Canadore College, Dietitian	International Academy of Natural Health Sciences, Teacher
Capital Health, Dietitian	KEYS Nutrition Services
Centre Hosp. Heberg, Dietitian	Lambton Health Unit, Dietitian 1
Crossroads Health Unit, Respondent	Lambton Health Unit, Dietitian 2
Crossroads Regional Health Authority, Respondent	Lambton Health Unit, Respondent
Diabetes Education Centre-Morden Hospital, Nurse	Lambton Health Unit- Diabetic/ Clinical Nutrition, Dietitian
Diabetes Health-Thunder Bay, Respondent	Laubach Literacy Ontario
Dietitians of Canada	Leamington District Memorial Hospital, Dietitian
Dryden District Diabetes Education Centre, Respondent	Lloydminster Health District, Respondent
Durham Region Health Department, Respondent	Manitoba Agriculture, Respondent 1
Manitoba Agriculture, Respondent 2	Parkland Regional Health Authority, Respondent
Manitoba-Health Department	P.E.I.- Health Department
Montreal Children's Hospital, Respondent	Peterborough County Health Unit, Respondent
New Brunswick- Health Department	Pharmasave/Consumer Drugmart, Respondent
Nipissing First Nation Health Services, Respondent	Preventive Dentistry Foundation, Respondent
North Shore Tribal Council, Respondent	Provost Health Centre, Dietitian

Health/Education/Media Respondents	
North York General Hospital, Dietitian 1	Royal University Hospital, Respondent
North York General Hospital, Dietitian 2	Saskatchewan Public Health
North York General Hospital, Respondent 1	Saskatoon District Health-Diabetes Education, Respondent
Nova Scotia Agricultural College, Respondent	Seniors Advisory Council of British Columbia, Respondent
Nova Scotia-Health Department	Simon Fraser Nutrition Program, Nutritionist
Nova Scotia Dietetic Association	Six Nations Council, Dietitian
Nutrition Guidance Services, Dietitian	St.Francis Xavier Nutrition, Professor
Ontario-Health Department	Sussex Unit- Extra Mural Program, Dietitian
Ontario Home Economics Association	Thunder Bay District Health Unit, Respondent 1
Ottawa Carleton Health Department, Respondent 1	Thunder Bay District Health Unit, Respondent 2
Ottawa Carleton Health Department, Respondent 2	Thunder Bay District Health Unit, Respondent 3
Ottawa Hospital-Civic Campus, Dietitian	Toronto Cancer Prevention Centre, Respondent
Ottawa Hospital-General Campus, Dietitian	Toronto Public Health
Palliser Health Authority, Dietitian	University of British Columbia, Respondent
Parkland Regional Health Authority, Dietitian	University of Guelph, Professor
University of Toronto-Nutritional Sciences, Professor	Waterloo Region Community Health Department, Dietitian
University of Western- Nutrition Program, Professor	Wellington Dufferin Guelph Health Unit, Respondent
Unknown, Respondent 1	Wikwenikong Health Centre, Respondent 1
Unknown, Respondent 2	Wikwenikong Health Centre, Respondent 2
Unknown, Dietitian 1	Winnipeg Community/ Long Term Care Authority, Respondent
Unknown, Dietitian 2	Youville Centre- Nurse Resource Centre, Dietitian
Vermilion Health Centre, Dietitian	

Public Respondents	
Action Réseau Consommateur	Consumers Association of Canada-Saskatchewan
Centre for Science in the Public Interest	*Consumers* Association of Canada
32 individual respondents	

Other Respondents
A coté de la cuisine
Canadian Food Inspection Agency
Eticon Consultants Ltd.
Food Dynamics Inc.
Food Industry Consultant

Appendix B
Consultation Questions by Theme

Content

1. Do you agree with the nutrients being proposed for the core list?
2. Can you share any educational insights regarding the nutrients on the new core list?

Format

1. How important is consistency of look? Explain.
2. To what degree should any graphic elements be prescribed?
3. Which panel title is better for consumers? Why?
4. Is providing the number of servings per package useful? Why?
5. Does it matter which order of presenting nutrients is selected? Why?
6. What are the educational challenges and solutions for the way nutrients are declared?
7. Which of the two bilingual formats do you prefer? Why

Availability

1. If the Policy Review results in a *voluntary system with incentives*, can you give us suggestions for incentives?
2. If the Policy Review results in a *mandatory system with exemptions*, what foods and businesses would you see being exempted?
3. We currently have a voluntary nutrition labelling system. Do you want it to change to a mandatory system? Why?

Education

1. What will make nutrition labelling education successful?
2. What will your role be in a consumer education program?
3. What would support you in helping consumers use the nutrition information panel?